

EXHIBIT G



**Garden City Center
100 Quentin Roosevelt Boulevard
Garden City, New York 11530-4850
Telephone (516) 357-3700 • Facsimile (516) 357-3792**

MELISSA MANNA
ASSOCIATE
DIRECT: 516-357-3753
FAX: 516-357-3792
E-MAIL MMANNA@CULLENANDDYKMAN.COM

December 20, 2019

Subin Associates, LLP
Attn: Maria C. Zieher, Esq.
150 Broadway, 23rd Floor
New York, New York 10038

Re: Hadmira C. Leacock v. Speedway LLC
D/Loss : 6/5/18
Our File No. : 23005-26

Dear Ms. Zieher:

We wrote to you on November 21, 2019 and December 13, 2019, requesting duly executed HIPAA compliant authorizations made out to **Cullen and Dykman LLP**, for all of your client's treatment providers, including radiological records, collateral source, FDNY ambulance/pre-hospital care reports, and authorizations to obtain your client's IRS tax returns in light of the lost earnings claim and the allegation that your client is self-employed. The authorizations served were made out to the prior defense firm. We have received a copy of your responses previously served and **again** the authorizations were made out to the prior firm. Please serve authorizations within the next ten days in order to avoid judicial intervention.

Please note that we will not be able to conduct your client's deposition until such time that we are in receipt of duly executed authorizations and have had a reasonable amount of time to process same.

Additionally, I am in receipt of your correspondence whereby you indicate you are not in receipt of our Demand for Ad Damnum. Please note that same was served with our initial discovery demands which were e-filed on December 19, 2019. Thus you are in possession of same, and same is available electronically. Regardless, attached is another demand for your review.

The demand for ad damnum is proper under CPLR 3017 (c) and must be responded to within 15 days. As such, please respond promptly in order to avoid motion practice.

Please accept the foregoing as our good faith attempt to obtain proper and complete responses to our discovery demands without the necessity of motion practice. Please provide responses to the demands within the next 10 days.

Thank you for your prompt attention to the foregoing.

Very truly yours,

MELISSA MANNA